Section 1. Registration Information

Source Identification

Facility Name:	FUJIFILM Electronic Materials U.S.A., Inc., Mesa
Parent Company #1 Name:	FUJIFILM Holdings America Corporation
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	11-Feb-2014
Postmark Date:	11-Feb-2014
Next Due Date:	11-Feb-2019
Completeness Check Date:	11-Feb-2014
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0007 5198
Other EPA Systems Facility ID:	85242LNMCR6550S

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	956985899
Parent Company #1 DUNS:	622205383
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	6550 S. Mountain Road
Street 2:	
City:	Mesa
State:	ARIZONA
ZIP:	85212
ZIP4:	7988
County:	MARICOPA

Facility Latitude and Longitude

Latitude (decimal):	33.297167
Longitude (decimal):	-111.594000
Lat/Long Method:	GPS - Unspecified
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	3
Horizontal Reference Datum Name:	World Geodetic System of 1984
Source Map Scale Number:	

Owner or Operator

Operator Name:	Scott A. Klamm, Site Manager
Operator Phone:	(480) 987-7000

Mailing Address

Operator Street 1:	6550 S. Mountain Road
Operator Street 2:	
Operator City:	Mesa
Operator State:	ARIZONA
Operator ZIP:	85212
Operator ZIP4:	7988
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Georganna L. Lagen
RMP Title of Person or Position:	Environmental, Health & Safety Mgr
RMP E-mail Address:	georganna_lagen@fujifilm-ffem.com

Emergency Contact

Emergency Contact Name:	Georganna L. Lagen
Emergency Contact Title:	Environmental, Health & Safety Mgr
Emergency Contact Phone:	(480) 987-7057
Emergency Contact 24-Hour Phone:	(480) 703-0532
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	georganna_lagen@fujifilm-ffem.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(480) 987-7000
Facility or Parent Company WWW Homepage Address:	http://www.fujifilmusa.com/products/semiconductor_materials/index.html

Local Emergency Planning Committee

LEPC:	Maricopa County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	210
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	01-May-2013
Last Safety Inspection Performed By an External Agency:	Maricopa County Air Quality Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Georganna L. Lagen
Preparer Phone:	(480) 987-7057
Preparer Street 1:	6550 S. Mountain Rd.
Preparer Street 2:	
Preparer City:	Mesa
Preparer State:	ARIZONA
Preparer ZIP:	85212
Preparer ZIP4:	7988
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000047820
Description:	Anhydrous Ammonium Storag
Process Chemical ID:	1000058121
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	67200
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000047821
Description:	HF Distillation & Process
Process Chemical ID:	1000058122
Program Level:	Program Level 3 process
Chemical Name:	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
CAS Number:	7664-39-3
Quantity (lbs):	278700
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000047820
Process NAICS ID:	1000048243
Program Level:	Program Level 3 process
NAICS Code:	325188
NAICS Description:	All Other Basic Inorganic Chemical Manufacturing

Process ID:	1000047821
Process NAICS ID:	1000048244
Program Level:	Program Level 3 process
NAICS Code:	325188
NAICS Description:	All Other Basic Inorganic Chemical Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000039128

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000041337

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Toxic Alter ID: 1000041338

Percent Weight:	70.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	

Emergency Shutdown:
Other Type:

Toxic Alter ID: 1000041339

Percent Weight:	70.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

Accident History ID: 1000032179

Date of Accident:	01-Nov-2011
Time Accident Began (HHMM):	0802
NAICS Code of Process Involved:	325188
NAICS Description:	All Other Basic Inorganic Chemical Manufacturing
Release Duration:	003 Hours 00 Minutes

Release Event

Gas Release:	Yes
Liquid Spill/Evaporation:	
Fire:	
Explosion:	
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	
Piping:	
Process Vessel:	
Transfer Hose:	
Valve:	Yes
Pump:	
Joint:	
Other Release Source:	

Weather Conditions at the Time of Event

Wind Speed:	3.0
Units:	miles/h
Direction:	SE
Temperature:	84
Atmospheric Stability Class:	B
Precipitation Present:	
Unknown Weather Conditions:	

On-Site Impacts

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	1
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage ($):	0

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0
Evacuated:	0

Sheltered-in-Place:	0
Off-Site Property Damage ($):	0

Environmental Damage

Fish or Animal Kills:	
Tree, Lawn, Shrub, or Crop Damage:	
Water Contamination:	
Soil Contamination:	
Other Environmental Damage:	

Initiating Event

Initiating Event:	Equipment Failure

Contributing Factors

Equipment Failure:	
Human Error:	Yes
Improper Procedures:	
Overpressurization:	
Upset Condition:	
By-Pass Condition:	
Maintenance Activity/Inactivity:	
Process Design Failure:	
Unsuitable Equipment:	
Unusual Weather Condition:	
Management Error:	
Other Contributing Factor:	

Off-Site Responders Notified

Off-Site Responders Notified:	No, not notified

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:	Yes
Revised Maintenance:	Yes
Revised Training:	Yes
Revised Operating Procedures:	
New Process Controls:	
New Mitigation Systems:	
Revised Emergency Response Plan:	
Changed Process:	
Reduced Inventory:	
None:	
Other Changes Introduced:	

Confidential Business Information

CBI Claimed:	

Chemicals in Accident History

Accident Chemical ID:	1000025390
Quantity Released (lbs):	20
Percent Weight:	100.0
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Flammable/Toxic:	Toxic

Section 7. Program Level 3

Description

Anhydrous ammonia is stored and reacted with hydrofluoric acid to produce 40% ammonium fluoride.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049540
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7
Prevention Program Level 3 ID:	1000041552
NAICS Code:	325188

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	04-Apr-2013

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	27-May-2011

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	13-Nov-2012

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	Yes
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	

Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	Yes
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Containment Area

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	

Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Improved materials of construction on gas line check valves and Relief valves on cooling water system

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	08-Jan-2014

Training

Training Revision Date (The date of the most recent review or revision of training programs):	07-Jul-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	08-Jan-2014
Equipment Inspection Date (The date of the most recent equipment inspection or test):	29-Jan-2014
Equipment Tested (Equipment most recently inspected or tested):	PM of Temperature Loop Pump P-561

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	17-Apr-2013
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	24-Jun-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	13-May-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	07-Apr-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	15-Dec-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	28-Sep-2013
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	26-Nov-2013

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	07-Feb-2014

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	04-Sep-2013

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	16-Jul-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	31-Jan-2014

Confidential Business Information

CBI Claimed:

Description

HF Distillation and Processing

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049541
Chemical Name:	Hydrogen fluoride/Hydrofluoric acid (conc 50% or greater) [Hydrofluoric acid]
Flammable/Toxic:	Toxic
CAS Number:	7664-39-3
Prevention Program Level 3 ID:	1000041553
NAICS Code:	325188

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	14-Oct-2013

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	24-May-2013

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-May-2014

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	Yes
None:	
Other Mitigation System in Use:	Liquid Containment Area

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	Yes
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	(1) Added additional storage capacity; (2) Converted dilution tank to blowdown tank

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	08-Jan-2014

Training

Training Revision Date (The date of the most recent review or revision of training programs):	07-Jul-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	05-Apr-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	15-Jan-2014
Equipment Tested (Equipment most recently inspected or tested):	PM for T511 High level Alarm

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	24-Apr-2013
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	24-Jun-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	02-Oct-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	07-Apr-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	15-Dec-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	13-Sep-2012
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	15-Oct-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	07-Feb-2014

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	04-Sep-2013

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	16-Jul-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	31-Jan-2014

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	29-Jan-2014

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	29-Jan-2014

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Mesa Fire Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(480) 644-2400

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	Yes
State EPCRA Rules or Laws:	Yes
Other (Specify):	OSHA 29CFR 1910.119 (n) Process Safety Management

Executive Summary

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

At the FUJIFILM Electronic Materials Mesa facility, we are committed to operating and maintaining all of our processes in a safe and responsible manner. A combination of accidental release prevention programs and emergency response planning programs are used to help ensure the safety of our employees and the public as well as protection of the environment. As a company, we are committed to excellence in health, safety and the environment.

The Mesa facility is committed to The Goal is Zero initiative, striving to achieve zero recordable injuries, zero environmental incidents, zero manufacturing process incidents, and zero distribution incidents. The same dedication to excellence marks the implementation of our corporate sustainability policy goals, under which we address health, safety and environmental performance throughout our products' life cycles. Sustainability and The Goal is Zero initiatives not only make good ethical and moral sense, but they respond to what our customers want and what our communities expect: that we operate in a safe and environmentally sound manner.

The following sections provide a brief overview of the comprehensive risk management activities designed and implemented at the Mesa facility.

STATIONARY SOURCE AND REGULATED SUBSTANCES HANDLED

The FUJIFILM Electronic Materials Mesa facility processes and supplies ultra high purity chemicals to the semiconductor and silicon wafer industries. Products include acids, etchants, aqueous developers, solvents and custom blend formulations. Current operations use the following toxic chemicals identified by EPA as having the potential to cause significant off site consequences in the event of a substantial accidental release:

Anhydrous ammonia is used in manufacture of ammonium fluoride solutions. A maximum 67,200 pounds is stored on site at the facility.
Hydrofluoric acid (>=50%) is received as a raw material. distilled, diluted to <50% concentration or blended with other acids/etchants prior to packaging. A maximum 278,700 pounds (100% basis) are handled/stored on site at regulated concentrations.

Our accidental release prevention programs and our contingency planning efforts help us effectively manage the hazards that are posed to our employees, the public, and the environment by our use of these chemicals. There are no RMP-regulated flammable chemicals handled or stored at/above threshold quantities at the Mesa facility.

GENERAL ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

A systematic, proactive approach is taken to prevent accidental releases of hazardous chemicals. To minimize the chance of a release with offsite implications, the Mesa facility has six layers of safety and environmental protection; our employees, mechanical integrity programs, hazard reviews, process controls, monitoring systems and emergency response.

Employees: Well trained employees with accurate operating procedures and strong management and engineering support are our most important resource in operating our facilities and in protecting the community.
Mechanical Integrity: This comprehensive inspection and testing program for operating equipment provides more reliable and well-maintained equipment, which greatly reduces the probability of failure.
Hazard Reviews: Reviews are conducted on all processes within the facility handling hazardous materials. Hazard Reviews identify things that could possibly go wrong so that these situations can be corrected and controlled before an incident occurs.
Process Controls: The Mesa Facility has a variety of back-up systems which provide precise control of processes and maintain

tight operating parameters.
Monitoring Systems: Product sensing detectors immediately identify any potential problems, giving operators an early warning which enables them to provide a quicker and more effective response.
Emergency Response: The Mesa Facility Emergency Response program is described in a later Section of this Executive Summary.

These individual elements of our prevention program along with the chemical specific prevention actions work together to prevent accidental chemical releases. Our company and our employees are committed to the standard that such management systems set the way we do business, and we have specific accountabilities and controls to ensure that we are meeting our own high standards for accident prevention. We maintain certification to the ISO 14001 Environmental Management System standard and the OHSAS 18001 Occupational Health and Safety Management System standard which further supports our commitment to our employees, the community and continual improvement of our operations.

FIVE-YEAR ACCIDENT HISTORY

Investigation records are maintained for all incidents that occur at our facility. We have had one accidental release in the last five years that meets the RMP rule reporting criteria. The incident occurred on November 1, 2011 when an employee participating in a response to a small, approximately 20 pound Anhydrous Ammonia gas release sustained an eye irritation when splashed with a very dilute Ammonium Hydroxide solution. The <1% solution was formed from the reaction of the Ammonia gas with water used to control the release. The employee was not wearing goggles that would have prevented the eye contact. The injury was an indirect result of the nonreportable release.

EMERGENCY RESPONSE PROGRAM

In the unlikely event of a major spill or release, the goal of the Site Emergency Response Team is to contain any releases and to correct the problem before any off-site impact occurs. Our emergency response plan (ERP) addresses the various federal, state, and local regulatory requirements for emergency planning, providing the essential elements for effectively protecting workers, the public, and the environment during emergency situations.

To assist us in the event of an emergency, local area emergency responders have been provided with our ERP. Facility Response Team members are on site 24 hours a day, 365 days a year. These highly trained employees are experienced in Chemical Emergency Response, as well as First Aid. On site drills and training are conducted on a regular basis.

The City of Mesa Fire Department is responsible for notifying the public of any release which has potential off-site impacts utilizing a "reverse 911" alert system.

PLANNED CHANGES TO IMPROVE SAFETY

Planned facility improvements whose implementation will help prevent accidental chemical releases from occurring and adversely affecting our employees, the public, and the environment includes installation of a water deluge system over the bulk tanks/bulk unloading area to maximize our ability to contain acid vapors from potential releases within the area.

In addition, plans are being made to initiate regular joint onsite emergency drills/training between the City of Mesa Fire Department and Hazmat Teams and FUJIFILM Electronic Materials Emergency Response Team members.